

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MOHAMMED WISHAH,)	
Plaintiff,)	
vs.)	No. 4:19-cv-03410-SRC
)	
THE CITY OF COUNTRY CLUB HILLS,)	
MISSOURI, et al.,)	
Defendants.)	

MOTION FOR STAY OF PRE-TRIAL FILING DEADLINES

Comes now Defendant, Officer Dennis Epps, and moves this Court to issue an order staying the portions of its Case Management Order pertaining to the submission of pre-trial submissions (stipulations, witness lists, exhibits lists, designations of deposition portions and interrogatory responses [the parties exchanged no admission requests], proposed instructions, trial briefs, and motions in limine), as to all parties, until at least three (3) business days after such time as this Court might rule on the parties' pending dispositive motions. Such a stay would promote judicial efficiency due to the anticipation that the Court's rulings will likely narrow, focus, and better define (or eliminate) many of the issues, if any, to be tried. Further, a stay would relieve the parties of the burden and expense of preparing and submitting pre-trial materials relating to matters/issues that may be resolved, in full or in part, by such rulings. In further support hereof, Defendant submits his Memorandum in Support of Motion for Stay of Pre-Trial Filing Deadlines, substantially simultaneously herewith.

/s/Mark H. Zoole
Mark H. Zoole, #38635MO
P.O. Box 190549
St. Louis, MO 63119
(314) 223-0436
zoole@sbcglobal.net
Counsel for Defendant Epps

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was sent via the court clerk's electronic notification system to all counsel of record, including Jay Kanzler, 2001 S. Big Bend, St. Louis, MO, 63117, on this 16th day of June, 2021.

/s/Mark H. Zoole